



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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October 7, 2020

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Matthew Jones v. Lieutenant Treubig, 16-CV-8080 (JGK) (KNF)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, representing defendant Lieutenant Christopher Treubig in the above-referenced civil action. Defendant writes respectfully to request that the Court extend his time for filing his opposition to plaintiff's motion for attorneys' fees from October 7, 2020, until October 13, 2020. Based on the parties' prior correspondence in which plaintiff would not consent to an extension beyond October 2, 2020, plaintiff does not consent to this request.

This is the third such request and the fourth request to extend the briefing schedule generally. By Order, dated August 21, 2020, the Court granted plaintiff's request for a two week extension of time to file his motion for attorneys' fees. Defendant consented to that application. By Order, dated September 21, 2020, the Court granted defendant's request, made on consent, to extend the parties' deadlines for filing opposition and reply briefs such that defendant's opposition would be filed by October 2, 2020, and plaintiff's reply would be filed by October 19, 2020. By Order, dated October 1, 2020, the Court granted defendant's request, not made on consent, for a brief extension from October 2, 2020 to today, October 7, 2020. The undersigned apologizes for the late nature of this request. It is due to additional scheduling conflicts for personal matters, and for professional matters, including supervising the Division's first jury trial of the Covid-era, which took place this week in the Southern District of New York. While the undersigned is seeking a brief extension, the undersigned is seeking enough time to prevent a further piecemeal request. If granted, defendant requests a corresponding extension of plaintiff's time to file a reply from October 26, 2020, until November 2, 2020.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Melanie Speight
Melanie Speight
Senior Counsel

CC: VIA ECF
Amir Ali
Alexis Padilla
David Zelman
Plaintiff's Counsel